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August 20, 2021

**VIA ECF**

Hon. Madeline Cox Arleo, U.S.D.J.  
U.S. District Court for the District of New Jersey  
Martin Luther King Building &  
U.S. Courthouse  
50 Walnut Street, Room MLK 4A  
Newark, New Jersey 07102

**Re: Ryan Dean v. J. Bissell, et als.**  
**Civil Action No.: 2:21-cv-09770-MCA-ESK**

Dear Judge Arleo:

Our firm has been retained to represent Defendant, Janet Fuhrer, in connection with the above captioned matter.

As set forth in our previous letter concerning other of our clients in this matter (Dkt. #42), Plaintiff's attempted service of process on Janet Fuhrer, a Canadian resident, by way of a letter sent by normal post containing Dropbox links does not constitute proper service of process under the Federal Rules of Civil Procedure and Articles 5 and 10 of The Hague Convention.

Given the issues regarding Plaintiff's attempted service and the sheer volume of the 457-page Complaint, we respectfully request that Defendant, Janet Fuhrer, be granted an extension of time until September 27, 2021, to answer to or otherwise respond to the Complaint.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

*/s/ Rachel R. Hager*

RACHEL R. HAGER

RRH:wjc

cc: All counsel of record (via ECF)